

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**JAMES GOODREAU AND
ANN GODDREAU,
Plaintiffs**

vs.

ICS, BLOUNT INC.
Defendant

C.A. NO. 05-11611 WGY

JOINT MOTION TO EXTEND DISCOVERY DEADLINES

Now come the parties in the above captioned matter and respectfully move this Honorable Court to extend the deadlines for expert discovery in this matter. As grounds therefore, the parties state as follows:

- a. This is a complex personal injury action involving allegations that the Plaintiff, James Goodreau, sustained a right tibia fracture, as well as multiple lacerations, while operating a hydraulic chainsaw.
- b. The parties ran into fact-based discovery scheduling difficulties due to a trans-continental Defendant and competing trial schedules of counsel. As such, discovery has taken longer than originally anticipated.
- c. As per the original discovery schedule set by the U.S. District Court, the deadline for Plaintiffs' expert disclosure was June 30, 2006; the deadline for Defendant's expert disclosures was July 31, 2006; and the deadline for the parties to complete expert discovery was August 31, 2006.

WHEREFORE, the parties respectfully request from this Honorable Court the following extensions, in the interest of justice: the deadline for Plaintiffs' expert disclosure be moved to September 30, 2006; the deadline for Defendant's expert disclosure be moved to October 31, 2006; and the deadline for expert depositions be moved to November 30, 2006. In addition, the parties respectfully request that this Honorable Court extend the remaining motion, conference, and trial deadlines accordingly.

Respectfully Submitted,
The Plaintiffs,
By Their Attorney,

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